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May 11, 2015

## <u>DuaneMorris</u>°

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AT 8:30\_\_\_\_M WILLIAM T. WALSH CLERK

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VIA FEDERAL EXPRESS (PLEASE DO NOT FILE ON ECF)

Hon. Anne E. Thompson
United States District Court Judge
District of New Jersey
Clarkson S. Fisher United States
Courthouse and
Federal Building
402 E State Street
Trenton, New Jersey 08608

Re: United States v. Parikh, 3:14-cr-00045 (AET)

Dear Judge Thompson:

We represent defendant Dhirenkumar Parikh. Mr. Parikh was sentenced by this Court on April 9, 2015 to a term of incarceration of one year and one day. We write to request an adjournment of Mr. Parikh's surrender date, which is now scheduled for May 14, 2014.

Mr. Parikh received notice from the Bureau of Prisons by letter dated May 4, 2015, which was received on or about May 6<sup>th</sup>. This gave Mr. Parikh approximately one week's notice of his impending surrender date and the location (Brooklyn) at which he will be confined.

While Mr. Parikh admittedly knew that an assignment was coming as of the date of his sentencing in April, he has simply not had sufficient time to prepare his family and put his personal and business affairs in order so as to be prepared for his absence from the family and his professional interests.

We therefore request that the Court adjourn Mr. Parikh's surrender date by a period of at least four weeks.

One of the reasons that Mr. Parikh has been unable to finalize his preparations for his departure is that he is continuing to cooperate with the United States. Since his sentencing, Mr.

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Parikh has continued to be a resource for federal law enforcement examining a variety of immigration related issues and has made an additional two trips to Virginia at the behest of federal law enforcement and in furtherance of his on-going cooperation. These efforts have, naturally enough, delayed Mr. Parikh's preparation for his surrender.

I have spoken with Ms. Chen regarding this matter. She has informed me that the government opposes our request.

Respectfully submitted,

Eric R. Breslin

Attachment

cc: AUSA Shana Chen, via Federal Express

## UNITED STATES DISTRICT COURT PROBATION OFFICE DISTRICT OF NEW JERSEY

WILFREDO TORRES CHIEF PROBATION OFFICER

THOMAS C. MILLER
SR. DEPUTY CHIEF PROBATION OFFICER

BETH L. NEUGASS DEPUTY CHIEF PROBATION OFFICER May 4, 2015

U.S. COURTHOUSE 50 WALNUT ST. ROOM 1001 NEWARK, NJ 07102 (973) 645-4240 FAX: (973) 645-3173

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Dhirenkumar Parikh 85 Arizona Avenue Old Bridge, NJ 08857

> Reg. Number: 64536-050 DOB: 08/15/1977 Docket Number: 14-00045-0

Docket Number: 14-00045-001 PACTS Number: 64387

## Re: VOLUNTARY SURRENDER TO DESIGNATED INSTITUTION

Dear Mr. Parikh:

This is to inform you that the Federal Bureau of Prisons has designated **Brooklyn** located at 80 29<sup>th</sup> Street, Brooklyn, NY 11232 as the institution for you to serve your sentence.

You are to voluntarily surrender to this institution at or before NOON on Thursday, May 14, 2015. If you have any specific questions concerning the facility, please call the institution directly at 718-840-4200.

Please understand that your failure to comply with this order will result in the institution considering you to be a fugitive.

Very truly yours,

Marybeth Wohl Administrative Assistant

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/mw

cc: The Honorable Anne E. Thompson, USDJ AUSA Shana W. Chen Mauro M. Wolfe, Esq. U.S. Marshal, Trenton, N.J. Pretrial Services, D/NJ Institution File